

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT**

EPA Region 5 Records Ctr.



200277

I. HEADING

DATE: August 22, 2003

SUBJECT: POLREP for the Resource Recovery Group/Clayton Chemical Site St. Clair County,
Sauget, Illinois

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POLREP #: POLREP #1 (Initial)

II. BACKGROUND

Response Authority: CERCLA (new number pending)
NPL Status: Non-NPL
Latitude: 38.597274119 N (# 1 Mobile Avenue)
Longitude: 90.181687309 W
State Notification: October 8, 2002
Start Date: August 4, 2003
Completion Date: November, 2003 (anticipated)

III. SITE INFORMATION

A. Incident Category

Time critical removal of liquid hazardous waste from a former permitted waste recycling facility.

B. Site Description

1. Site location

The Resource Recovery Group (RRG) / Clayton Chemical Site ("Site") consists of an approximate 7.5 acre contiguous parcel within the city boundaries of Sauget, Illinois. The site is bordered by Mobile Avenue to

the north, Trade Waste Incineration to the west and the American Bottoms Water Treatment to the south. Also, a multitude of above ground storage tanks (AST), process units, drum storage buildings, and an office with a laboratory constitute the facility.

2. Description of threat

An unspecified amount of liquid hazardous and nonhazardous substances remain on-site in a multitude of above ground storage tanks and associated piping, 55-gallon drums, and miscellaneous containers. Since the Site is abandoned, in a state of disrepair, and in close proximity to the Mississippi River and surrounding businesses, the remaining liquid hazardous and non-hazardous substances will be removed by the Performing Respondents identified in the Administrative Order by Consent, Docket No. V-W-03-C-720.

3. Site background

Prior to 1961, the property was owned by GM&O Railroad who utilized the property as a roundhouse. In 1961, Clayton Chemical Company leased the facility to recovery solvents and waste oils. On May 12, 1981, the Village of Sauget deeded the Site property to the Clayton Chemical Company. Clayton Chemical Company operated the facility to recycle and recover used solvents and waste oils. In November of 1996, Clayton Chemical Company discontinued operations at the Site. Between 1996 and 1998, the Site was operated as a waste oil and spent solvents recycling and recovery business by Resource Recovery Group. The Illinois Environmental Protection Agency denied a RCRA Part B permit for the Site in 1998, which halted further acceptance of hazardous and non-hazardous wastes and ceased any further activity on the Site.

4. State and local actions to date

The Clayton Chemical Company Site came to the U.S. EPA Removal Branch's attention through the Illinois Environmental Protection Agency (IEPA). IEPA has performed routine RCRA inspections since the facility's operation in the late 1970's. IEPA deferred the Site to U.S. EPA in early 2001. U.S. EPA conducted a removal site assessment in June 2001.

IV. SITE INFORMATION

A. Situation

1. Response activities to date

Work began on the site on August 4, 2003 with the following:

- The existing Site security fence lock was replaced so as to control site ingress and egress through the main Site gate entrance.
- A portable office trailer with electrical generator was mobilized and set-up on-site for site command operations.
- A contamination reduction and hot zone work area with a decontamination facility was established.

- A preconstruction meeting was held on August 6, 2003 with representatives from O'Brien & Gere, Clean Harbors, Illinois EPA and START.
- Sample collection activities of bulk liquids contained in ASTs were initiated on August 6, 2003. Additionally, an oil/water interface probe was used to better quantify the volume of water, oils and solvents contained in all above ground tanks.
- With the exception of crude oil Tank G-4, all AST's had representative samples collected of each layer. Representative sample containers were delivered to a Clean Harbors laboratory for characterization purposes. The surface contents of Tank G-4 was impenetrable to conventional sampling equipment. An additional attempt will be made the week of August 18, 2003.
- 55-gallon drums and miscellaneous containers were opened and color coded for liquids or solids contents identification. Furthermore, drums containing liquids shall be consolidated with like materials prior to sampling and inventory. All empty drum containers are being staged adjacent to the former waste drum processing/storage building.

B. Planned Removal Activities

- Ongoing operations will sample remaining tanks and containers containing liquids for future off-site disposal.
- Liquid laboratory waste materials will be inventoried for future off-site disposal.

C. Next Steps

- Continue with sample operations for Tank G-4 and remaining drums not yet consolidated or inventoried.
- On-site collection of various sampling media for potential hazardous identification/classification.

D. Key Issues

- After all representative samples are collected and submitted for laboratory analysis purposes, a period of limited site activities will occur for waste profile and disposition approval requirements.

V. COSTS

- PRP funded project.